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Department of Energy

Ohio Field Office Fernald Environmental Management Project P. O. Box 538705 Cincinnati, Ohio 45253-8705 (513) 648-3155



DOE-0384-04

AUG 3 0 2004

Mr. James A. Saric, Remedial Project Manager United States Environmental Protection Agency Region V, SR-6J 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager Ohio Environmental Protection Agency 401 East 5th Street Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE REVISED CERTIFICATION DESIGN LETTER AND PROJECT SPECIFIC PLAN FOR CERTIFICATION SAMPLING FOR AREAS 3A AND 3B

References:

- Letter, J. Saric to J. Reising, "Areas 3A and 3B CDL and Certification Sampling PSP," dated July 27, 2004
- 2) Letter, T. Schneider to W. Taylor, "Conditional Approval CDL and PSP for Area 3A/3B Certification Sampling," dated August 13, 2004

Enclosed for your approval are responses to the Ohio Environmental Protection Agency comments and the Revised Certification Design Letter (CDL) and Project Specific Plan (PSP) for Certification Sampling for Areas 3A and 3B. Comment responses have been incorporated into the CDL and both the CDL and PSP were conditionally approved per the above-noted references.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

William J.

Director

FCP:Reising

Enclosures: As Stated

Mr. James A. Saric Mr. Tom Schneider -2-

DOE-0384-04

cc w/enclosures:

- J. Reising, OH/FCP
- T. Schneider, OEPA-Dayton (three copies of enclosures)
- G. Jablonowski, USEPA-V, SR-6J
- F. Bell, ATSDR
- M. Cullerton, Tetra Tech
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH
- AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

- N. Akgündüz, OH/FCP
- K. Johnson, OH/FCP
- R. Abitz, Fluor Fernald, Inc./MS64
- K. Alkema, Fluor Fernald, Inc./MS01
- B. Brucken, Fluor Fernald, Inc./MS41
- J. Chiou, Fluor Fernald, Inc./MS64
- K. Flaugh, Fluor Fernald, Inc./MS64
- M. Frank, Fluor Fernald, Inc./MS64
- W. Hooper, Fluor Fernald, Inc./MS60
- S. Lorenz, Fluor Fernald, Inc./MS41
- F. Miller, Fluor Fernald, Inc./MS64
- D. Nixon, Fluor Fernald, Inc./MS01
- T. Poff, Fluor Fernald, Inc./MS65-2
- D. Powell, Fluor Fernald, Inc./MS64
- ECDC, Fluor Fernald, Inc./MS52-7

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE CERTIFICATION DESIGN LETTER FOR AREA 3A AND AREA 3B

FERNALD CLOSURE PROJECT FERNALD, OHIO

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE CERTIFICATION DESIGN LETTER FOR AREA 3A AND AREA 3B (20803-RP-0001, REVISION A)

COMMENTS

Commenting Organization: Ohio EPA

Commenter: OFFO

Section #: Figure 1-5

Pg #: Line #: Code: C

Original Comment #: 1

Comment:

Please add the footprint of HWMU 20 on the map to clarify where it lies in relation to the

3B boundaries.

Response:

Agree.

Action:

The footprint of HWMU 20 will be added to Figure 1-5.

Commenting Organization: Ohio EPA 2. Section #: 2.1.1

Pg #: 2-3

Commenter: OFFO Line #: 4-5

Code: C

Original Comment #: 2

Comment:

This section refers to Figure 2-1. According to the text, "shades of red represent areas where additional excavation is necessary". The next line states that "this figure demonstrates that all planned soil excavation has been performed". Figure 2-1 clearly shows areas in the northern section of what is 3A that are red, meaning more excavation is necessary. It is assumed the text is meant to state that all excavation in the scaled down certification Area 3A is complete, not in all of 3A. Please clarify.

Response:

Agree.

Action:

The sentence will be corrected to read, "This figure demonstrates that all planned soil excavation has been performed within the scaled down certification area of 3A."

3. Commenting Organization: Ohio EPA

Commenter: OFFO

Section #: 2.1.2

Pg #: 2-4

Line #: 24-26

Code: C

Original Comment #: 3

Comment:

Same issue as Comment 2 for Area 3B. Please clarify.

Response:

Action:

The sentence will be corrected to read, "This figure demonstrates that all planned soil

excavation has been performed within the scaled down certification area of 3B."

4. Commenting Organization: Ohio EPA

Commenter: OFFO

Section #: 4.1.2

Pg #: 4-3

Line #: 29-30

Code: C

Original Comment #: 4

Comment:

This section discusses four samples which will be taken outside of the 3B certification boundary to satisfy the HWMU closure. As they are outside the boundary and runon/runoff controls, these samples will not be acceptable to use for certification when the area outside 3B is certified in the future.

Response:

Agree.

Action:

None.

5. Commenting Organization: Ohio EPA

Section #: 4.1.3

Pg #: 4-5

Commenter: OFFO Line #: 1-2

Code: C

Original Comment #: 5

Comment:

This section discusses surveying and field verifying to make sure no surface obstacles will be present to prevent collection of samples at the planned locations for certification

sampling. Please discuss how areas underwater will be addressed.

Response:

Agree. Sample locations that are underwater will be pumped and then the location will be

sampled.

Action:

The document will be revised to address locations that are underwater.

Commenting Organization: Ohio EPA 6.

Commenter: OFFO

Section #: Figure 4-2

Pg #:

Line #:

Code: C

1,40

Original Comment #: 6

Comment:

This figure shows the location of previously collected samples. These samples are never mentioned in the text. It is assumed these samples are ones taken when the excavations were close to the GMA and immediate backfill was necessary. Please clarify what these samples are in the text.

Response:

The discussion of all previously collected samples is located in Section 4.1.3.

Action:

None.